

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE
(Southern Division)**

JANE DOE,

c/o

Charles G. Douglas, III, Esq.

14 South Street, Suite 5

Concord, New Hampshire 03301

Plaintiff,

v.

ST. PAUL'S SCHOOL,

325 Pleasant Street

Concord, New Hampshire 03301

Defendant.

Case No. 1:18-cv-00390

* * * * *

**MOTION FOR ADMISSION *PRO HAC VICE* OF
DEBORAH K. MARCUSE, ESQUIRE**

Pursuant to Local Rule 83.2(b), the undersigned respectfully moves for the admission *pro hac vice* of Deborah K. Marcuse, Esquire, of Sanford Heisler Sharp, LLP, 400 East Pratt Street, 8th Floor, Baltimore, Maryland 21202, 410-834-7415 (direct), 410-834-7420 (office), 410-834-7425 (facsimile), dmarcuse@sanfordheisler.com, for purposes of appearance as co-counsel on behalf of the Plaintiff in the above-captioned case only. In support of this Motion, the undersigned states as follows:

1. Movant, Charles G. Douglas, III, Esquire, of the law firm of Douglas, Leonard & Garvey, P.C., 14 South Street, Suite 5, Concord, NH 03301, is a member in good standing of the New Hampshire Bar and the United States District Court for the District of New Hampshire.

2. Deborah K. Marcuse is not admitted to practice in the United States District Court for the District of New Hampshire. She is a member in good standing of the bars of Connecticut,

New York, District of Columbia, and Pennsylvania; the United States District Courts for the Eastern and Southern Districts of New York, District of Connecticut, and Western District of Pennsylvania; the United States Court of Appeals for the Second Circuit; and, the United States Supreme Court.

3. Deborah K. Marcuse is not currently suspended or disbarred in any jurisdiction, and there are no disciplinary proceedings pending against her.

4. Deborah K. Marcuse is familiar with the Local Rules of the United States District Court for the District of New Hampshire.

5. In accordance with the Local Rules of this Court, Deborah K. Marcuse's affidavit in support of this Motion has been attached as Exhibit A.

6. In accordance with the Local Rules of this Court, Deborah K. Marcuse has made payment of this Court's \$100.00 admission fee contemporaneously with the filing of this Motion.

7. In accordance with the Local Rules of this Court, Deborah K. Marcuse will register as a Filing User of the Court's ECF system by completing an online registration form on the Court's website at www.nhd.uscourts.gov.

9. Because the relief requested herein is discretionary with the Court, no accompanying memorandum of law is believed to be required.

WHEREFORE, Charles G. Douglas, III, Esquire, moves this Court to enter an Order for Deborah K. Marcuse, Esquire, to appear before this Court on behalf of Plaintiff for all purposes relating to the proceedings in the above-captioned matter.

Respectfully submitted,
JANE DOE
By their attorneys,
DOUGLAS, LEONARD & GARVEY, P.C.

Date: June 6, 2018

By: /s/ Charles G. Douglas, III
Charles G. Douglas, III (NH Bar No. 669)
DOUGLAS, LEONARD & GARVEY, P.C.
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically served via ECF to all counsel of record
on this 6th day of June 2018.

/s/ Charles G. Douglas, III
Charles G. Douglas, III